



Scotland's Garden & Landscape Heritage

Economy, Planning and Employability Services
Fife Council
Kingdom House
Kingdom Avenue
Glenrothes KY7 5LY
By email only development.central@fife.gov.uk

26 May 2020

Ref: 20/00831/FUL

For the attention of David Shankland

Dear Mr Shankland,

20/00831/FUL Change of use from former reservoir tank and erection of two storey extension to form dwellinghouse (Class 9) with associated vehicular access and parking: Former Reservoir North Of Culross, Fife

The above application has recently been brought to the attention of Scotland's Garden and Landscape Heritage (SGLH). As successor to the Garden History Society in Scotland, SGLH is a registered charity the aim of which is to promote and protect Scotland's historic garden and designed landscape heritage. As such we wish to offer the following comments about the application which will have an impact on the Culross Abbey House designed landscape. Culross Abbey House is included in the Inventory of Gardens and Designed Landscapes in Scotland and is therefore assessed by Historic Environment Scotland to be a Heritage Asset of National Significance. In the Inventory assessment the 'Scenic Value' of the designed landscape is accorded 'High' owing to the prominence of The Park and Woodland from the B9037.

Under the current conditions we have been unable to make a site visit and our comments are therefore based on an assessment of the documents submitted in support of the application, together with desktop study of online resources, and current images available.

Culross Abbey House, now Category A Listed, was built in 1608 and an engraving by John Slezer of 1693 records the intricate terraced gardens to the south of the house and tree-lined avenues to the east and north. General Roy's Military Survey of circa 1755 depicts the

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detailed geometric layout of the landscape some sixty years later, with the full extent of the north and east avenues. While much of the planting along the north avenue has been lost by the time of the First Edition Ordnance Survey of 1859, evidence of this feature is still visible in the landscape today and one which the current owner of Culross Abbey House has sought to restore in a slightly more westerly location to align with, and frame views both to and from the house.

The proposed development site lies within the designated boundary of the designed landscape and not, as stated erroneously in the applicant's supporting statement, 'alongside'. It is an elevated position, approximately 200m from and 25m higher than the Abbey House, with currently little or no screening between the two. There is a clear, uninterrupted line of sight south from the field access immediately to the east of the proposed development site, along the tree-lined avenue to Culross Abbey House (see image below). Whilst the current reservoir structure is all but invisible from the house and, excluding the surrounding fence, very low-key in views from the north, the proposed dwelling, a further two stories higher will be exposed, dominant and intrusive in the landscape. It will not only impact on key views to and from the Abbey House but also the wider panoramic views across Culross to the Firth of Forth. We note that the dwelling is described as a conversion and whilst in planning terms this might be strictly accurate, in reality it will appear as an intrusive, new-build, large-scale dwelling, out of character in this open agricultural landscape.



View South from Field Access Immediately East of Proposed Development Site to Culross Abbey House (Centre).
Current Reservoir Fencing Visible to RHS of Image

Although some mitigation is proposed in the form of coniferous planting between the proposed house and the Abbey House, with their relative elevations it is unlikely to prove an effective screen. It would also seem likely that the occupant of the new property would wish

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to retain advantage of these panoramic southward views and permission for at least some felling is likely to be sought in the future.

As such we consider this proposal is contrary to both National and Local Planning and Heritage Policy and Guidance as follows:

Scottish Planning Policy SPP (2014)

Policy Principles

137. The planning system should promote the care and protection of the designated and non-designated historic environment (including individual assets, related settings and the wider cultural landscape)...

Gardens and Designed Landscapes

148. Planning authorities should protect and, where appropriate, seek to enhance gardens and designed landscapes included in the Inventory of Gardens and Designed Landscapes and designed landscapes of regional and local importance.

Historic Environment Policy for Scotland (2019)

Policies on managing change

HEP4 Changes to specific assets and their context should be managed in a way that protects the historic environment....

Managing Change in the Historic Environment: Gardens and Designed Landscapes (2016 updated 2020)

- assessing the impact of development (on an Inventory Landscape). Any impact that might compromise these (Inventory) values should be avoided.

Managing change in the Historic environment: Setting (2016 updated 2020)

- views to, from and across or beyond the historic asset or place

Fife Local Development Plan (FifePlan) 2017

Policy 8 Housing in the countryside

Renovation of Existing Buildings

18. To justify planning permission, the existing building must have some architectural merits that justify its preservation and the proposal being put forward must respect its original character and design...

- The existing building must be built from traditional, durable materials such as stone, rather than more modern materials such as brick, timber, metal, plastic, concrete, glass, and iron.
- It must be worthy of preservation.
- The building must be physically and structurally capable of being converted without having to significantly demolish, rebuild or extend.

Policy 13 Natural Environment and Access

Development proposals will only be supported where they protect or enhance natural heritage and access assets including:

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- landscape character and views

Policy 14 Built and Historic Environment

... Proposals will not be supported where it is considered they will harm or damage:

- sites recorded in the Inventory Historic Gardens and Designed Landscapes and other non-inventory gardens and designed landscapes of cultural and historic value

To summarise: Scotland's Garden and Landscape Heritage can only advise that Fife Council refuse planning permission for this application on the grounds that it will cause irreversible visual damage to the setting of, and therefore loss of value of the Culross Abbey House designed landscape, a Nationally Significant Heritage asset. Taking into account the topography of this area, it seems unlikely that any effective mitigation measures can be undertaken to reduce this impact. It is contrary to National and Local Planning and Heritage Policy. Further, it will have a negative impact on views in the wider landscape and countryside.

SGLH would be pleased to be consulted on any future applications affecting Culross Abbey House and other Inventory and non-Inventory designed landscapes in Fife. In the meantime we would be grateful to be advised of the outcome of this application in due course.

Yours sincerely,

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